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February 23, 2024

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: Just Play, LLC v. A.S. Plastic Toys Co., Ltd., et al.
Case No. 19-cv-9399
Status Letter

Dear Judge Ramos:

We represent Plaintiff Just Play, LLC (“Plaintiff”) in the above-referenced action and respectfully submit the instant letter in accordance with the Court’s December 26, 2023 Order. (Dkt. 107).

As indicated in Plaintiff’s December 22, 2023 status letter (Dkt. 106), Plaintiff’s counsel has been communicating with an attorney, who, upon information and belief, previously worked with Mr. Orel and now represents the Orel Defendants. Plaintiff’s counsel is in close contact with new counsel for the Orel Defendants and expects to receive the executed settlement agreements for ten (10) of the Orel Defendants that Plaintiff reached settlement with from their new counsel in the coming weeks. Accordingly, Plaintiff respectfully requests additional time to finalize such settlements with the Orel Defendants and confirm that no further Orel Defendants wish to settle before Plaintiff moves for default judgment against them, and respectfully requests to (1) submit a status letter providing the Court with an update, or (2) move for default judgment by April 26, 2024.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

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